

MODULE VIII

CORRECTIVE ACTION PLAN DEVELOPMENT PROCEDURES FOR GROUNDWATER CONTAMINATION AND/OR SOLID WASTE MANAGEMENT UNITS AND SCHEDULE OF COMPLIANCE

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VIII.A. SOLID WASTE MANAGEMENT UNITS

The Permittee shall conduct a corrective action investigation, in accordance with Module VIII, for each Solid Waste Management Unit (SWMU) specified in Table 1.

- VIII.A.1 The Executive Secretary may add SWMUs to those in Tables VIII-1 and VIII-2, in accordance with R315-3-15, based on additional information received by the Permittee, the Executive Secretary, the Administrator, or any other knowledgeable source.

VIII.B. STANDARD CONDITIONS

- VIII.B.1 Failure to submit the information required by Module VIII or falsification of any submitted information is grounds for termination of this permit in accordance with R315-3-16.

- VIII.B.2 The Permittee shall sign and certify all plans, reports, notifications, and other submissions to the Executive Secretary and the Assistant Region Administrator, in accordance with Conditions I.BB. and I.DD.

- VIII.B.3 The Permittee shall submit a minimum of two copies of each plan, report, notification, or other submissions within Module VIII, to the Executive Secretary and the Assistant Regional Administrator when applicable.

- VIII.B.2 If the submission addresses Cell B\6, the PCB Tank Farm or Storage Building, or the Surface Impoundment if managing F039 from Cell B\6, or the Leachate or Stabilization Tanks while managing PCBs, both the Executive Secretary and the Assistant Regional Administrator shall receive the submissions.

- VIII.B.3 Upon written approval by the Executive Secretary, all plans and schedules required by the conditions of this module shall be incorporated into Module VIII upon completion of an appropriate comment period. Any noncompliance with such approved plans and schedules may be subject to enforcement action.

- VIII.B.3.a The Permittee shall submit all final reports to the Executive Secretary and

the Assistant Regional Administrator in the time frames specified. The final reports shall incorporate all comments from the reviews of previews drafts.

- VIII.B.4 Upon written approval from the Executive Secretary, the Permittee may receive extensions of the specified compliance schedule due dates for the submittals required by Module VIII.
- VIII.B.5 If the Executive Secretary determines that further actions beyond those provided by Module VIII, or changes to that which are stated herein, are warranted, the Permittee shall petition the Executive Secretary to modify Module VIII.
- VIII.B.6 All raw data, such as laboratory reports, drilling logs, bench-scale or pilot-scale data, and other supporting information gathered or generated during activities undertaken pursuant to conditions in Module VIII shall be maintained by the Facility for the effective term of this permit, including any post-closure care period. These records must be accessible to the Executive Secretary and the Assistant Regional Administrator within one working day from the date of request.

VIII.C. RCRA FACILITY INVESTIGATION

- VIII.C.1 As required by the Executive Secretary, the Permittee shall conduct a RCRA Facility Investigation (RFI) to determine the nature and extent of known and suspected releases of hazardous waste or hazardous constituents in groundwater, originating from any location at the Facility including from a SWMU, as identified in Table VIII-2, and to gather data to support the Corrective Action Plan (CAP). The Permittee shall conduct the RFI in accordance with the schedule specified in Table VIII-3.
- VIII.C.2 The Permittee shall prepare and submit the RFI Workplan (designated as Task II) to be reviewed and approved by the Executive Secretary. The Permittee shall then perform the RFI activities as specified in the approved workplan.
- VIII.C.3 The RFI workplan shall include:
 - VIII.C.3.a A Project Management Plan detailing a discussion of the technical approach to the investigation, schedules, milestone reports and personnel;
 - VIII.C.3.b A Data Collection Quality Assurance Plan to establish and document all monitoring procedures;
 - VIII.C.3.c A Data Management Plan to track investigation data and results;

- VIII.C.3.d A Health and Safety Plan for safe conduct of corrective action activities; and
- VIII.C.3.e A Community Relations Plan for public dissemination of information.
- VIII.C.4 Along with the RFI Workplan, the Permittee shall prepare and submit a Description of Current Conditions (designated as Task I) in accordance with the schedule in Table VIII- 3. The report shall include:
 - VIII.C.4.a Background information gathered during previous investigations or inspections and other relevant data;
 - VIII.C.4.b Nature, extent, and rate of migration of contamination, if known; and
 - VIII.C.4.c Past or current activities at the Facility.
- VIII.C.5 The Permittee shall implement (Task III) the approved RFI Workplan. The Permittee shall present data of adequate technical quality to support the contention that no further action is required or the development and evaluation of corrective measures alternatives presented in the CAP. Task III shall consist of:
 - VIII.C.5.a Characterization of the environmental setting at the Facility, including the hydrogeology, soils, surface water, sediment, and air;
 - VIII.C.5.b Source characterization of all waste management areas at the Facility, including the nature of the unit and the type of waste place in the unit as described by chemical and physical characteristics;
 - VIII.C.5.c Contamination characterization, including analysis of hazardous waste or hazardous constituents from SWMUs and the effects of such hazardous waste or hazardous constituents on groundwater, soils, surface water, sediment, air, subsurface gases; and
 - VIII.C.5.d Potential receptor identification describing the potential for human and environmental impact from contaminant exposure from the facility;
- VIII.C.6 The Permittee shall prepare an analysis and summary of the RFI(s) including results. This task, Investigation Analysis, shall be designated as Task IV. The objective of Task IV shall be to ensure that the investigation data are sufficient in quality and quantity to describe the nature and extent of contamination, potential threat to human health and the environment, and to produce the CAP. Task IV shall consist of:
 - VIII.C.6.a Data analysis of the type and extent of contamination at each SWMU

including sources and migration pathways;

VIII.C.6.b Protection standards for groundwater, soil, or other relevant protection standard;

VIII.C.7 The Permittee shall submit a schedule of activities and reports, to the Executive Secretary as required by Table3 of this module.

VIII.D. INTERIM MEASURES AND VOLUNTARY CLEAN UP ACTIONS

VIII.D.1 If, during the course of any activity initiated in compliance with the conditions of Module VIII of this permit, the Executive Secretary or the Permittee determines that a release or potential release of hazardous waste or hazardous constituents from a SWMU poses a threat to human health and the environment, the Permittee shall be required to perform specific interim measures.

VIII.D.1.a If any release or potential release of hazardous waste or hazardous waste constituents poses an immediate danger to human health or the environment, the Permittee shall inform the Executive Secretary at once. The Executive Secretary may then require corrective action to be implemented without delay.

VIII.D.2 The Executive Secretary, shall notify the Permittee in writing of the requirement to perform the interim measures specified in the Interim Measures Plan, in accordance with Condition VIII.D.3.

VIII.D.3 Within 30 calendar days of receiving the written notification requiring the Interim Measures Plan as specified in Condition VIII.D.2., the Permittee shall provide the Interim Measures Plan to the Executive Secretary for approval. The Interim Measures Plan shall include the following:

VIII.D.3.a Mitigation of potential threats to human health and the environment that is consistent with and integrated into any long term solution at the Facility;

VIII.D.3.b Data collection quality assurance and data management information;

VIII.D.3.c Design plans and specifications, construction requirements, operation and maintenance requirements, project schedules, and final design documents;

VIII.D.3.d Construction quality assurance objectives, inspection activities, sampling requirements, and documentation; and

VIII.D.3.e Schedule for submittal of the following reports; progress reports, interim measures workplan, final design documents, draft interim measures

report, and final interim measures report.

- VIII.D.4 The Permittee shall perform the requirements of the Interim Measures Plan.
- VIII.D.5 The Permittee may propose to initiate voluntary interim measures in accordance with Condition VIII.D.6.
- VIII.D.6 In determining whether an interim measure may be considered voluntary, the Permittee shall evaluate the following:
- VIII.D.6.a Time required to develop and implement a final remedy;
- VIII.D.6.b Actual and potential exposure of human and environmental receptors;
- VIII.D.6.c Actual and potential contamination of drinking water supplies and sensitive ecosystems;
- VIII.D.6.d The potential for further degradation of the medium absent interim measures;
- VIII.D.6.e Presence of hazardous constituent(s) in containers that may pose a threat of release;
- VIII.D.6.f Presence and concentration of hazardous constituent(s) in soils that have the potential to migrate to groundwater or surface water;
- VIII.D.6.g Weather conditions that may affect the current levels of contamination;
- VIII.D.6.h Risks of fire, explosion, or accident; and
- VIII.D.6.i Other situations that may pose threats to human health and the environment.
- VIII.D.7 If the Executive Secretary disagrees with the Permittee proposed voluntary interim measures, the Permittee shall follow the requirements of Condition VIII.D.3.

VIII.E. NOTIFICATION REQUIREMENTS FOR AND ASSESSMENT OF NEWLY IDENTIFIED SOLID WASTE MANAGEMENT UNITS

- VIII.E.1 The Permittee shall notify the Executive Secretary in writing, of any newly identified SWMU(s) not identified in Section VIII.A., within 30 calendar days of discovering the SWMU(s). The notification shall include the location of the new SWMU(s) and information on the suspected or known wastes at the site.

- VIII.E.2 Within 150 calendar days following a request from the Executive Secretary for a SWMU Assessment Plan for any newly discovered SWMU, the Permittee shall submit a SWMU Assessment Plan to the Executive Secretary.
- VIII.E.3 The SWMU Assessment Plan shall include:
- VIII.E.3.a A description of past and present operations at the unit(s); and
- VIII.E.3.b Any groundwater, surface water, soil (surface or subsurface strata), or air sampling and analysis data needed to determine whether a release of hazardous constituent(s) from such unit(s) is likely to occur. The SWMU Assessment Plan shall demonstrate that the sampling and analysis program, if applicable, is capable of yielding representative samples and shall include parameters sufficient to identify migration of hazardous constituent(s) from the newly discovered SWMUs to the environment.
- VIII.E.4 The SWMU Assessment Plan shall be evaluated by the Executive Secretary and;
- VIII.E.4.a The Permittee shall receive written approval from the Executive Secretary for the SWMU Assessment Plan; or
- VIII.E.4.b The Permittee shall receive written notice from the Executive Secretary of the SWMU Assessment Plan's deficiencies and the written notice will specify a due date for submittal of a revised assessment plan; or
- VIII.E.4.c The Permittee shall receive written notice from the Executive Secretary of the revisions incorporated by the Executive Secretary in the SWMU Assessment Plan. The revised assessment plan shall become the approved SWMU Assessment Plan.
- VIII.E.5 The SWMU Assessment Plan, as approved by the Executive Secretary specified in Condition VIII.E.4., shall be incorporated within Module VIII.
- VIII.E.6 The Permittee shall implement the approved SWMU Assessment Plan within 30 calendar days of receiving written notice of the approval by the Executive Secretary. The assessment shall be completed within 180 days of approval.
- VIII.E.7 Within 30 days of completion of the assessment, the Permittee shall submit a SWMU Assessment Report to the Executive Secretary.
- VIII.E.8 The SWMU Assessment Report shall provide all results obtained from the implementation of the approved SWMU Assessment Plan, including:

- VIII.E.8.a The SWMU location, identified on a map;
- VIII.E.8.b The type and function of the unit, including general dimensions and a structural description;
- VIII.E.8.c The period during which the unit was operated; and
- VIII.E.8.d A list of all wastes managed at the SWMU and results of all sampling and analysis used to determine whether releases of hazardous waste or hazardous constituents has occurred, are occurring, or are likely to occur from the unit.
- VIII.E.9 Based on the results of the SWMU Assessment Report, the Executive Secretary shall determine the need for further investigations at specific SWMUs included in the SWMU Assessment Report. If the Executive Secretary determines that such investigations are needed, the Executive Secretary shall require the Permittee to prepare a RCRA Facility Investigation Workplan under Section VIII.C.

VIII.F. DETERMINATION OF NO FURTHER ACTIONS

- VIII.F.1 At any time during an investigation of a SWMU, the Permittee may petition the Executive Secretary for a determination of no further action (NFA).
- VIII.F.2 The NFA petition shall contain information based on the SWMU Assessment Report, the RFI or any other information that demonstrates that:
 - VIII.F.2.a Hazardous waste or hazardous constituents are not detected; or
 - VIII.F.2.b Hazardous waste or hazardous constituents have been detected, but are below background concentrations; or
 - VIII.F.2.c Hazardous waste or hazardous constituents have been detected, but do not pose a threat to human health or the environment;
- VIII.F.3 A determination of NFA, in accordance with Condition VIII.F.1., shall not preclude the Executive Secretary from requiring further investigations, studies, or remediation at a later date if new information or subsequent analysis indicates a release or potential of a release from a SWMU at the Facility. In such a case, the Permittee shall modify the Corrective Action Schedule of Compliance of Module VIII.

VIII.G. CORRECTIVE ACTION PLAN

- VIII.G.1 Based on the results of the RFI, the Permittee shall submit to the Executive Secretary for review and approval a Corrective Action Plan (CAP) for all SWMUs that have been identified to have a release of hazardous waste or hazardous constituents, in accordance with the schedule specified in Table VIII- 4 of Module VIII. The CAP shall include:
- VIII.G.1.a Target cleanup objectives;
- VIII.G.1.b Corrective action(s) that shall satisfy target cleanup objectives;
- VIII.G.1.c Summary of all corrective measure alternatives examined for the CAP; and
- VIII.G.1.d Schedule for implementation of the corrective action(s) according to the timeframe and schedule contained in Module VIII.
- VIII.G.2 If the CAP addresses Cell B\6, the PCB Tank Farm or Storage Building, or the Surface Impoundment if managing F039 from Cell B\6, or the Leachate or Stabilization Tanks while managing PCBs, the Assistant Regional Administrator shall also receive the submissions identified in VIII.G.1.a through VIII.G.1.d.
- VIII.G.3 Within 30 days upon receipt of comments of the Executive Secretary (and the Assistant Regional Administrator if applicable) the Permittee shall modify the CAP or submit a new CAP for the Executive Secretary's approval.
- VIII.G.4 The Executive Secretary (and the Assistant Regional Administrator if applicable) shall consider performance, reliability, implementability, safety, human health, and the environmental impact of the measure(s) in approving the CAP.
- VIII.G.5 Upon approval of the CAP, the Permittee shall implement the corrective action(s) according to the schedule as approved in the CAP. The approved schedule for the CAP shall be incorporated in Table VIII- 4, Corrective Action Compliance Schedule.
- VIII.G.6 The Permittee shall furnish or retain all personnel, materials, and services necessary for the implementation of the CAP.

VIII.H. REPORTING REQUIREMENTS

- VIII.H.1 The Permittee shall submit to the Executive Secretary, and the Assistant Regional Administrator when applicable, written quarterly progress reports

of all activities conducted after the effective date of the approved CAP. The Permittee shall submit the first quarterly progress reports no later than 90 calendar days after the effective date of the approved CAP.

- VIII.H.2 The quarterly progress reports shall contain:
 - VIII.H.2.a A description of the work completed;
 - VIII.H.2.b Summaries of all findings and all raw data;
 - VIII.H.2.c Summaries of all problems encountered during the reporting period and actions taken or to be taken to rectify problems; and
 - VIII.H.2.d Projected work for the next reporting period.
- VIII.H.3 The Permittee shall maintain copies of the reports, drilling logs, and data at the Facility during the effective period of this permit.

TABLE 1

LIST OF SOLID WASTE MANAGEMENT UNITS (SWMUs)

NUMBER	SWMU DESCRIPTION
1	Landfill Cell 1 ¹
2	Landfill Cell 2 ¹
3	Landfill Cell 3 ¹
4	Landfill Cell 4 ¹
5	Landfill Cell 5 ¹
6	Landfill Cell 7 ¹
7	Solid Waste Landfill Cell 1 ¹
8	Solid Waste Landfill Cell 2 ¹
9	Solid Waste Landfill Cell 3 ¹
10	Leachate Treatment Area and Tanks ¹
11	Waste Stabilization Area and Tanks ¹
12	RCRA storage Area ¹
13	Solvent Storage Tank ¹
14	RCRA Surface Impoundment ¹
15	RESERVED ¹
16	Old Operations Area (lab, septic system, etc.)
17	Thaw Sheds ¹
18	Wheel Wash Stations (including TSCA X, Y, Z station and B station)
19	90-Day Areas, 90-Day Accumulation Tanks, and associated piping ¹
20	Runoff control Ponds
21	Maintenance Buildings
22	Solvent Recovery Tanks (removed) and caustic pipe ¹
23	Scrap Yard
24	Container Holding Areas Prior to disposal and Empty Roll-off Box Area
25	Closed AST Fuel tanks south and active AST north of Surface Impoundment
26	TSCA Landfill Cells X, Y, Z, and A ²
27	RCRA/TSCA Landfill Cell B/6 ¹

This list of SWMUs was compiled in June of 1993 and kept current with permit modifications.

¹ Addressed in Facility Closure Plan.

² Addressed in TSCA Facility Closure Plan.

TABLE 2

**LIST OF SOLID WASTE MANAGEMENT UNITS (SWMU) THAT SHALL BE
ADDRESSED IN A RFI WORKPLAN**

NUMBER	SWMU DESCRIPTION
9	Industrial Waste Landfill Cell 3
16	Old Operations Area (lab, septic system, etc.)
17	Thaw Sheds
18	Truck Wash Stations (including X,Y,Z station) and RCRA empty container wash
19	90-Day Areas, 90-Day Accumulation Tanks, and associated piping
20	Runoff control Ponds
21	Maintenance Buildings
22	Solvent Recovery Tanks (removed) and caustic pipe
23	Scrap Yard
24	Container Holding Areas Prior to disposal and Empty Roll-off Box Area
25	Closed AST Fuel tanks south and active AST north of Surface Impoundment

This list of SWMUs was compiled in June of 1993 and kept current with permit modifications. This list of solid waste management units was initially compiled in June of 1993 by inspection of the waste management units located at the Facility.

TABLE 3

RCRA Facility Investigation Compliance Schedule

<u>Activity</u>	<u>Due Date</u>
1. Submit Task I - Current Conditions Report	Within 180 days of the detection of contamination or directive from the Executive Secretary
2. Submit Task II - Draft RFI workplan and schedule	Within 90 days from submission of Task I Current Conditions Report.
3. Begin Task III - Facility Investigation according to the approved Task II RFI workplan and schedule	Within 60 days of Executive Secretary's approved Task II RFI workplan and schedule.
4. Submit Task IV - Investigation Analysis	As indicated in the Executive Secretary's approved Task II RFI workplan and schedule.
5. Submit Tasks III and IV Summary and Final reports	As indicated in the Executive Secretary's approved Task II RFI workplan and schedule.

TABLE 4

Corrective Action Compliance Schedule

<u>Facility Submission</u>	<u>Due Date</u>
1. Draft CAP.	Within 180 days of the Executive Secretary's approval of the final RFI Report.
2. Final CAP.	Within 60 days of receiving the Executive Secretary's comments on the Draft CAP.
3. CAP Construction and Implementation reports.	As specified in CAP as approved of by the Executive Secretary.
4. Draft CQA (Construction Quality Assurance) program plan.	Prior to construction
5. Final CQA (Construction Quality Assurance) program plan.	Within 60 days of the Executive Secretary's approval of draft CQA plan.
6. Construction of corrective measures.	As approved in final CAP
7. Construction certification inspection	As approved in the final CQA plan
8. Corrective measure construction report	90 days following completion of construction.
9. Progress Reports.	Quarterly, within 90 days after the CAP is approved.